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**UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**BARK, CASCADIA WILDLANDS,  
OREGON WILD, AND  
WILDEARTH GUARDIANS,**

Plaintiffs,

v.

**U.S. FOREST SERVICE,**  
a federal agency,

Defendant,

and

Case No.: 3:18-cv-01645-MO

**DECLARATION OF JOSH  
LAUGHLIN IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
SUMMARY JUDGMENT**

**HIGH CASCADE, INC.,**  
a Washington Corporation.

Defendant-Intervenor.

I, JOSH LAUGHLIN, declare as follows:

1. The facts set forth in this declaration are based on my personal knowledge, and if called as a witness, I could and would competently testify thereto under oath. As to those matters which reflect a matter of opinion, they reflect my personal opinion and judgment upon the matter.
2. My name is Josh Laughlin. I am over the age of eighteen, and I reside in Eugene, Oregon.
3. I am a full-time staff member and Executive Director at Cascadia Wildlands. I have been involved with Cascadia Wildlands as an employee or volunteer since its inception in 1998. I am a member in good standing of Cascadia Wildlands and Oregon Wild. I am familiar with and support these organizations' various missions to protect and restore Oregon's wildlands, wildlife, and water.
4. I routinely use and enjoy the forests managed by the Mt. Hood National Forest and definitely plan to continue to do so in the future. I visit these forests for hiking, nature observation, wildlife observation, scenic enjoyment, photography, skiing, and other recreational pursuits.
5. Cascadia Wildlands has approximately 10,000 supporters and members across the country who are interested in and support Cascadia Wildlands' work to protect and restore the ecosystems and species of the Cascadia Bioregion. The formation of Cascadia Wildlands in 1998 was catalyzed by the practice of clearcutting temperate ancient forests authorized by the Salvage Rider passed by Congress. As a result of this and continuing threats in this arena, we devote much of our efforts towards protecting older forests. Monitoring public lands timber sales

remains the central tenant of one of our primary organizational programs: Protecting Forests and Wild Places.

6. One reason Cascadia gives such high priority to protecting older forests is that they are critical to the survival of species teetering on the brink of extinction, including the northern spotted owl. Cascadia Wildlands and its members derive substantial benefits from the existence of spotted owls. The spotted owl is an iconic representation of the plight of older forests in the Pacific Northwest. We appreciate the ecosystem balance that managing for this species requires, as well as simply appreciating the intrinsic value of the species.

7. Our Protecting Forest and Wild Places Campaign promotes the restoration and conservation of our forests and is grounded in science. We believe the proposed Crystal Clear timber sale runs contrary to contemporary scientific recommendations for the management of wet forests. The timber sale compromises the recovery of imperiled species present in the project area. The implementation of the Crystal Clear timber sale will harm our interest in responsible, scientifically-sound, and forward-looking management of our forests. It will harm our interests in the recovery of the imperiled species present in the project area.

8. Cascadia Wildlands has communicated with the Forest Service about our concerns and interests surrounding older forest logging, including the current proposal. We regularly feature older forests in our quarterly newsletter, *Cascadia Quarterly*, through our monthly electronic bulletins to our supporters and members, on social media and on our website. Our membership remains concerned with the proposed logging in the Crystal Clear timber sale.

9. My interests will be harmed if proposed logging activities proceed under the Crystal Clear timber sale as planned. The extensive logging proposed in the project area will diminish

my enjoyment of hiking through the area and detract from the aesthetic appeal of these forests. I will suffer irreparable injury from the logging because the area will likely not recover from this logging in my lifetime. I will be harmed if these forests are cut down.

10. Additionally, Cascadia Wildlands' organizational interest in educating our members about environmental issues surrounding public land management is harmed because the agency has not taken a hard look as required by NEPA.

11. My interests would be supported if the agency would follow the law. In our comments on the Crystal Clear project, I requested additional information and scientific support for the agency's proposals and analysis of impacts. If given a hard look, this information would both enable me to educate myself, our members and supporters about the use of our public lands, as well as result in a project that would not cause so much harm to imperiled species and older forests.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 7th day of January, 2019 in Eugene, Oregon,

A handwritten signature in black ink, reading "Josh Laughlin". The signature is fluid and cursive, with the first name "Josh" and last name "Laughlin" clearly distinguishable.

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JOSH LAUGHLIN  
Executive Director, Cascadia Wildlands